

SARA TITLE III SECTION 313 INSPECTION REPORT
04-313U-029

- I. **Date of Inspection:** July 13, 2004
- II. **Facility:** Columbia Forest Products
Chatham Facility
100 Paul Road, SW
Chatham, Virginia 24531

SIC: 2435

Facility Description: The facility is located near a residential area. The grounds and buildings are maintained in good condition.

Process: Columbia Products operates a hardwood plywood mill in Chatham, Virginia. Hardwood face veneer sheets and various core materials are laid up with resin and consolidated into a single panel by hydraulic press. The plywood is trimmed, puttied, sanded, and packaged for shipment. Some of the plywood moves on to the finishing line where it is finished with ultraviolet light (UV) coatings. Wood wastes are burned in a Boiler.

- III. **EPA Inspector:**
- Abraham Reich
Environmental Engineer/Inspector
Toxics Programs & Enforcement Branch (3WC33)
(215) 814-2157

- IV. **Company Officials:**

Doane Cowan
Regional Engineer
(434) 432-2591

Telephone conversations with:
Danielle M. Lenzini
Project Scientist
Secor International, Incorporated
7730 Southwest Mohawk Street
Tualatin, OR 97062
(503) 691-2030

V. **Purpose of Inspection:**

This inspection was conducted to inspect, document, and verify the facility's compliance with the reporting requirements stated in 40 C.F.R. Part 372 under Section 313 of SARA Title III.

VI. **Sara Title III:**

A plant, factory, or other facility comes under the provisions of Section 313 if it meets all three of the following criteria;

1. The facility is included in Standard Industrial Classification (SIC) codes 10 (except 1011, 1081, and 1094), 12 (except 1241), 20 to 39, 4911, 4931, 4939 (limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce), 4953 (limited to facilities regulated under the RCRA Subtitle C, 42 U.S.C. Section 6921 *et seq.*), 5169, 5171, and 7389 (limited to facilities primarily engaged in solvents recovery services on a contract or fee basis); and
2. It has 10 or more full-time employees (or the equivalent 20,000 hours per year).
And
3. It manufactures (including imports), or processes, or otherwise uses a listed toxic chemical during any calendar year in amounts greater than the threshold quantities specified below.

Thresholds are specific amounts of toxic chemicals used during the calendar year that triggers reporting requirements.

1. If a listed toxic chemical is manufactured, imported or processed, the threshold quantity is 25,000 pounds per toxic chemical or category over the calendar year.
2. If a listed toxic chemical is otherwise used (without incorporating it into any product or producing it at the facility), the threshold quantity is 10,000 pounds per toxic chemical or category over the calendar year.
3. Starting with calendar year 2000, manufactured, processed, or "otherwise-use" thresholds of these additional chemicals also called Persistent Bioaccumulative Toxic Chemicals (PBT) are as follows;

100 pounds - aldrin, methoxychlor, pendimethalin, polycyclic aromatic compounds, tetrabromobisphenyl A, trifluralin;

10 pounds - chlordane, heptachlor, mercury, mercury compounds, toxaphene, isodrin, polychlorinated biphenyls, benzo(g,h,i)perylene, hexachlorobenzene, octachlorostyrene, pentachlorobenzene;

0.1 grams - dioxin and dioxin - like compounds.

4. Starting with calendar year 2001, manufactured, processed, or "otherwise- use" of the chemical lead in amounts greater than or equal to the amounts specified, a Form R is required:

100 pounds - lead which is not contained in stainless steel, brass, or bronze alloy.

100 pounds - lead compounds.

VII. Opening Conference:

1. Inspection Procedures and General Information:

On July 13, 2004, a Section 313 inspection was conducted at Columbia Forest Products. On June 9, 2004, prior to the inspection, a letter was sent to the company confirming the date of the inspection and requesting the availability of documentation (attachment D2). The EPA inspector met with company representatives at 0840. The inspector's credentials were presented and a Notice of Inspection was presented and explained (Attachment A). Mr. Cowan signed the notice and an outline of the areas to be investigated were discussed.

VIII. Summary:

Section 313 was the primary focus of the inspection. The facility was telephoned on June 7, 2004, to determine if an inspection was warranted (attachment D1). A copy of the notice of inspection was sent to the Superfund Removal Branch to allow them the option to further investigate compliance with Sections 302, 311, and 312 at their discretion.

Mr. Cowan stated that the plant's primary SIC Code is 2435. The remainder of the inspection involved determining if the plant manufactured, processed, or otherwise used any one of the listed toxic chemicals in excess of the threshold in calendar years 2000, 2001 and 2002.

Mr. Cowan provided a copy of a "Toxic Release Inventory Threshold Determination " for reporting year 2003. The report was prepared by Secor International Incorporated, 7730 Southeast Mohawk Street, Tualatin, OR 97062, Phone: (503) 691-2030.

Telephone contact was made with Secor International to obtain data for the reporting years 2000, 2001, and 2002.

The number of employees and sales for the year being examined are as follows:

	2000	2001	2002	2003
Employees: (approximately)	221	213	211	203

Secor International has been using guidance from the National Council For Air and Steam Improvement, Incorporated (NCASI) in determining mineral concentrations in the wood processed by the Columbia Forest Products Incorporated. They consider this guidance as being more representative of the industry.

For the inspection, they had compiled summaries of usages of Section 313 chemicals for reporting year 2003 as shown in attachment D3. Calculations for Lead are presented in attachment D4. *(Abe's spreadsheet prepared by Abe)*
These calculations indicate no clear factor for determining Lead in wood.

IX. Closing Conference:

Chemical usage records and Material Safety Data Sheets (MSDS) were requested by the EPA Inspector and the SARA Title III Section 313 investigation was concluded. Receipts for samples and documents were completed (attachment B) at the conclusion of all inspection activities.

X. Attachments:

- A. Notice of Inspection
- B. Receipts for Samples and Documents
- C. FTTS
- D.
 - 1. Initial Telephone Call Record
 - 2. Letter To Facility Confirming Date of Inspection
 - 3. Secor Report
 - 4. Lead Analysis using various factors

XI. Summary of Findings:

Columbia Forest Products did not submit a Form R under Section 313 of SARA Title III for the reporting year 2000, 2001, and 2002. The records showed that the facility had greater than 10 employees (221, 213, and 211 respectively for the years being examined) and is a manufacturer (SIC Code 2435).

There is no clear factor for determining the Lead content in wood (see attachment D4).



NOTICE OF INSPECTION
U.S. ENVIRONMENTAL PROTECTION AGENCY
 Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 7-13-04	INSPECTOR NO. 011	DAILY SEQ. NO.	0840	Columbia Forest Products
4. INSPECTOR ADDRESS U. S. EPA Region III 1650 Arch Street Mail Code: 3WC33 Philadelphia, Pennsylvania 19103-2029			5. FIRM ADDRESS 100 Paul Rd Chatham VA 24531	

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986, Section 313 toxic chemical release reporting requirements. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE <i>Abraham Reich</i>		RECIPIENT SIGNATURE <i>Doane E. Cowan</i>	
NAME Abraham Reich		NAME DOANE E. COWAN	
TITLE Inspector/Technical Advisor	DATE SIGNED 7-13-04	TITLE Regional Engineer	DATE SIGNED

ATTACHMENT B


 US ENVIRONMENTAL PROTECTION AGENCY
 WASHINGTON, DC 20460

 Superfund Amendments and Reauthorization Act - Title III
 Emergency Planning and Community Right-to-Know Act of 1986

 Form Approved
 OMB No. 2070-0007
 Approval expires 3-31-88

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION		2. FIRM NAME
DATE	INSPECTOR NO. 011	DAILY SEQ. NO.
3. INSPECTOR ADDRESS U. S. EPA Region III 1650 Arch Street Mail Code: 3WC33 Philadelphia, Pennsylvania 19103-2029		4. FIRM ADDRESS Columbia Forest Products 100 Park Rd. Chatham VA 24531

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Emergency Planning and Community Right-to-Know Act of 1986.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
001	2003 TAA Threshold Data
002	2003 Maintenance Chemicals 143294

Chemical identities for underlined items have been claimed as trade secret. The facility official requesting such treatment has read and understands EPCRA Section 322 and pertinent trade secret regulations and understands EPCRA Section 325 which provides for (among other things) penalties for frivolous claims.

INSPECTOR SIGNATURE <i>Abraham Reich</i>		RECIPIENT SIGNATURE <i>Doane E. Cowan</i>	
NAME Abraham Reich		NAME DOANE E. COWAN	
TITLE Inspector/Technical Advisor	DATE SIGNED	TITLE	DATE SIGNED

ATTACHMENT C

Return Form To: Abraham Reich (3WC33)

FTTS DATA ENTRY FORM

INSPECTION

Inspection Date 7/13/04
 Inspector Number 011
 Inspection Seq. 001
 Legislation Ind. E Investigation Type EEA
 Inspection Status C
 Region/State 03
 Inspector Name Abraham Reich
 Reason for Inspection NSR Referral _____
 File Number 04-313U-029
 Date Rpt. Rec. 08/26/04 Warrant Required N
 Number of Samples 0
 CBI: y n X _____ Number School _____
 School Type _____
 Facility Function MN
 EPA Established _____
 Number of Audits _____
 Prod. Reg. # _____

REMARKS:

Site Name: Columbia Forest Products, Inc..
 Address: 100 Paul Road
 City: Chatham State: VA
 Zip Code: 24531

Site Duns No.: _____
 Site SIC Codes No 2435

Parent Co. Name: _____
 Parent Co. Add.: _____
 Parent Co. City: _____
 State: _____ Zip Code: _____

Identifier : _____
 Rep_Comp : _____
 Field_Cit : _____
 Longitude : _____
 Latitude : _____

CASE REVIEW

Inspection Date: / /
 Inspector Number: _____

Inspection Seq.: _____ Samples Number: _____

Docket Number: _____ Case Number: _____
 Linked Docker 1: _____ Linked Case 1: _____
 Linked Docket 2: _____ Linked Case 2: _____
 Linked Docket 3: _____ Linked Case 3: _____
 Linked Docket 4: _____ Linked Case 4: _____

Site Name: _____
 File Number: _____
 Referral Type: _____ Region/State: _____
 Legislation Ind: _____ CBI: y n _____
 Case Review Officer: _____
 Date Review Started: / /
 Date Review Completed: / /
 Action Warranted: _____
 Investigation Type: _____

REMARKS: _____
 ACTTYPE: _____
 CASE DEVELP: _____
 CASE NUM: _____
 DOCKET NUM: _____
 DATE ORC: _____
 DATE ISSUE: _____

SAMPLES

Inspection Date / /
 Inspector Number: _____
 Inspection Sequence: _____
 Sample Number: _____

Site Name: _____
 Lab Name: _____
 Sample Medium: _____
 Prod Reg #: _____
 Date Sample Sent: / /
 Date Results Received: / /
 Violative: _____

REMARKS: _____

[illegible][illegible][illegible][illegible][illegible]

29 June 1962

[illegible][illegible][illegible][illegible][illegible][illegible]

- [illegible]

[illegible][illegible][illegible]

ATTACHMENT D

EPA Region III Initial Telephone Call Record

Date of Call: 6-7-04

Facility Name: Columbia Forest Products Inc

Facility Address: Specialty P/T
575 KENTUCK RD
DANVILLE VA 24540-5656

County: DANVILLE City

Phone Number: 434-793-6724

Facility Contact: _____

Inspector Making Call: A. Reich

SIC Code: 3441 Emp.: 20 Fac. Size: 30 Kft square \$ 1-5

Call: _____

Send Info.: _____

- 1) Are you familiar with SARA Title III? Yes _____ No _____
(If yes, move to question 2. If no, give a brief explanation).
- 2) Are you familiar with Section 313 of SARA Title III? Yes _____ No _____
- 3) Did you report under Section 313 for the 199__ Reporting Year? Yes _____ No _____
- 4) Did you report under Section 313 for the 200__ Reporting Year? Yes _____ No _____
- 5) Did you report under Section 313 for the 200__ Reporting Year? Yes _____ No _____
- 6) Did You report under Section 313 for the 200__ Reporting Year? Yes _____ No _____
- 7) Name of business? (I.e. do you do any manufacturing or processing at your site or are you just a distribution sales Center?)
WOODEN PLATFORMS



04-3138-027

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

June 9, 2004

Mr. Doane Cowan
Columbia Forest Products, Inc.
100 Paul Road
P.O. Box F
Chatham, Virginia 24531

RE: Superfund Amendments and Reauthorization Act (SARA) Title III Section 313 Inspection

Dear Mr. Cowan:

This letter will confirm that Mr. Abraham Reich will visit your facility July 13, 2004 at 9:30 a.m. to conduct a SARA Title III inspection. Mr. Reich is assisting the Environmental Protection Agency (EPA) under a cooperative agreement with the Senior Services America, Incorporated (SSAI) as part of the Senior Environmental Employment (SEE) Program. As part of the technical assistance provided to EPA, Mr. Reich provides inspection services under my direction and monitoring pursuant to the Emergency Planning Community Right To Know Act (EPCRTKA), SARA Title III. As a SEE enrollee, Mr. Reich is authorized by EPA to have access to Confidential Business information, and has signed a Non-Disclosure agreement regarding such information.

To save time during the inspection, please have available for review and collection by the inspector the following documents for the 2000, 2001, and 2002 calendar years:

- ▶ A list of all EPCRTKA Section 313 chemicals used, number of employees, and sales for the years specified above;
- ▶ Annual usage summaries (pounds) of each EPCRTKA Section 313 chemical with supporting documentation for each year indicated above (supporting documentation should include such items as beginning and end of year inventory, purchase records, and if applicable, import records);
- ▶ Chemical production records for all Section 313 chemicals or chemical categories manufactured, processed, or otherwise used at your facility.
- ▶ **Note:** If your facility manufactures, processes, or otherwise uses mixtures which contain Section 313 chemicals, please provide for each of these mixtures a copy of the Material Safety Data Sheet (MSDS), or other written notification which specifies the chemical composition of the mixture.

In addition to the above items, please **provide a brief summary of your manufacturing process** and notify Mr. Reich of any safety equipment (e.g. eye or ear protection, safety shoes, hard hat, etc.) he should bring with him to the inspection. If time permits, he will tour your plant. Should you have any questions, please call Mr. Reich at (215) 814-2157.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig E. Yussen".

Craig E. Yussen
EPCRA Section 313 Compliance Coordinator
EPA Region III

cc: Section 313 State Contact
EPA: Carole Dougherty (3HS33)

Columbia Forest Products
Chatham Virginia Facility
Employment & Production Volumes

Year	2000	2001	2002	2003
Average Total Employment	221	213	211	203
Production Volume (MSF)	78,009	68,472	73,919	79,022

2003 Maintenance Product Usage
Columbia Forest Products, Chatham, Virginia

Product	Approximate Usage (max) Units	Density (lbs/gallon)	SARA 313 Chemical	Max Amount (%)	Amount of 313 Chemical (lbs)
Black Max 380 Black Tough Instant Adhesive	1.25 gallon	9.16	Phthalic Anhydride 0.1-1%	1	0.11
Quick Set 404 Instant Adhesive	30 grams		Hydroquinone 0.1-1%	1	0.00066
Loctite Pneumatic-Hydraulic 545 Thread Sealant	0.5 gallon	8.5	Cumene Hydroperoxide 3-5%	5	0.21
Loctite 290 Threadlocker Wicking Grade	0.25 gallon	8.91	Cumene Hydroperoxide 3-5%	5	0.11
Never Seez Regular Grade	0.25 gallon	10.08	Copper 5-10%	10	0.25
			Zinc Oxide 1-5%	5	0.13
Loctite 660 Quick Metal Retaining Compound	0.25 gallon	9.16	Cumene Hydroperoxide 1-3%	3	0.069
Loctite Anti-Seize Lubricant	2 gallons	9.79	Copper 1-5%	5	0.98
Loctite C5A Copper Base Antiseize	2 gallons	10.84	Copper 20-30%	30	6.50
Loctite Permanent Threadlocker	0.25 lbs		Cumene Hydroperoxide 1-3%	3	0.0075
CRC Moly Lube	75 lbs		Xylene 1-4%	4	3
Grainger vitrified bonded abrasive products	100 lbs		Cobalt Aluminate 0.1-2%	2	2
Buckeye Castleguard	1 gallon	8.58	Diethylene Glycol Ethyl Ether 5%	5	0.43
Simple Green	40 gallons	8.54	2-butoxyethanol 6%	6	20.50
Multifak EP2 grease	75 lbs		Zinc dialkyl dithiophosphate 1-2.99%	2.99	2.24
Castrol SFT Grease NLGI#2	75 lbs		Zinc Compounds 1.5%	1.5	1.13
Citgo Citgard Motor Oil	200 gallons	7.41	Zinc alkyldithiophosphate 0-2%	2	29.64
Safety Kleen 105 Solvent	120 gallons	6.55	Perchloroethylene 0-0.2%	0.2	1.57
Ken Kromlik Universal Metal Primer	1 gallon	12.83	Toluene 3%	3	0.38
			Ethylbenzene 2%	2	0.26
			Xylene 11%	11	1.41
			1, 2, 4-Trimethylbenzene 3%	3	0.38
Sherwin Williams Industrial Enamel	1 gallon	8.33	Ethylbenzene 0.1%	0.1	0.0083
RMC Formula 260	1 gallon	8.66	Diethylene Glycol Butyl Ether 10%	10	0.87
Open and Shut	40 lbs		Trichloroethylene 50-75%	75	30
Rust Lick	0.25 gallon	Unknown	Barium Compound 11-30% (3.8% barium)	30	
Invisilube	50 lbs		Hexane 28%	28	14
			Cyclohexane 1%	1	0.5
State 999	3 gallons	8.97	Ethylene glycol monobutyl ether 4%	4	1.08
Glycol Ether EB	55 gallons	7.51	Ethylene glycol monobutyl ether 98-100%	100	413.05
CRC Dry Glide	3 gallons	6.08	n-Hexane 10%	10	1.82
Sherwin Williams Lubricants	1 gallon	6.04	Copper Compound 2%	2	0.12
			Zinc Compounds 2%	2	0.12
Steel Blue Layout Fluids	3 gallons	7.08	1-butanol 1-10%	10	2.12
Totals (lbs)					535.01

SARA 313 Chemical or Chemical Group Totals	Total (lbs)
Phthalic Anhydride	0.11
Hydroquinone	0.0007
Cumene Hydroperoxide	0.40
Copper	7.74
Zinc Compounds	33.25
Xylene	4.41
Cobalt Compounds	2
Glycol Ethers	435.92
Perchloroethylene	1.57
Toluene	0.38
Ethylbenzene	0.26
1, 2, 4-Trimethylbenzene	0.38
Trichloroethylene	30
Barium Compound	0
Hexane	15.82
Cyclohexane	0.50
Copper Compound	0.12
1-butanol	2.12
Total (lbs)	535.01